# Section 1. Registration Information

Source Identification

Facility Name:

Mississippi Phosphates Corporation

Parent Company #1 Name: Parent Company #2 Name:

Submission and Acceptance

Submission Type: Re-submission

Subsequent RMP Submission Reason: 5-year update (40 CFR 68.190(b)(1))

Description:

 Receipt Date:
 29-Oct-2010

 Postmark Date:
 29-Oct-2010

 Next Due Date:
 29-Oct-2015

 Completeness Check Date:
 29-Oct-2010

Complete RMP: Yes

De-Registration / Closed Reason Other Text:

De-Registered / Closed Date:

De-Registration / Closed Reason:

De-Registered / Closed Effective Date:

Certification Received: Yes

Facility Identification

EPA Facility Identifier: 1000 0006 8954

Other EPA Systems Facility ID: MSD07790913

Dun and Bradstreet Numbers (DUNS)

Facility DUNS: 623082963

Parent Company #1 DUNS: Parent Company #2 DUNS:

Facility Location Address

Street 1: 601 Industrial Road

Street 2:

City: Pascagoula
State: MISSISSIPPI
ZIP: 39568

ZIP4:

County: JACKSON

Facility Latitude and Longitude

Latitude (decimal): 30.210420

Longitude (decimal): -88.38452

Lat/Long Method: Address Matching - Other

Lat/Long Description: Center of Facility

Horizontal Accuracy Measure: 10

Horizontal Reference Datum Name: World Geodetic System of 1984

Source Map Scale Number:

EPA Facility Identifier: 1000 0006 8954 Plan Sequence Number: 1000017139

Owner or Operator

Operator Name: Operator Phone:

Mississippi Phosphates Corporation

(228) 712-3363

Mailing Address

Operator Street 1:

601 Industrial Road

Operator Street 2:

Operator City:
Operator State:

Pascagoula MISSISSIPPI

39568

Operator ZIP:

Operator ZIP4:

Operator Foreign State or Province:

Operator Foreign ZIP: Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:

RMP Title of Person or Position:

RMP E-mail Address:

Samuel Cunningham
Environmental Manager

samc@missphosphates.com

**Emergency Contact** 

Emergency Contact Name: Emergency Contact Title:

Emergency Contact Phone: Emergency Contact 24-Hour Phone:

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address:

Samuel Cunningham Environmental Manager

(228) 712-3307

(228) 712-3363

samc@missphosphates.com

Other Points of Contact

Facility or Parent Company E-mail Address:

Facility Public Contact Phone:

Facility or Parent Company WWW Homepage

Address:

(228) 712-3307

www.missphosphates.com

Local Emergency Planning Committee

LEPC:

Jackson County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:

FTE Claimed as CBI:

240

Yes

Yes

Covered By

OSHA PSM: EPCRA 302:

CAA Title V:

Yes

Air Operating Permit ID:

1280-00044

**OSHA** Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency)

30-Oct-2008

Last Safety Inspection Performed By an External

Agency:

State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:

Preparer Phone:

Preparer Street 1:

Preparer Street 2:

Preparer City:

Preparer State:

Preparer ZIP:

Preparer ZIP4:

Preparer Foreign State:

Preparer Foreign Country:

Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided:

Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:

See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

**Process Chemicals** 

Process ID:

1000021280

Description:

Ammonia (anyhdrous)

Process Chemical ID:

1000025186

Program Level:

Program Level 3 process

Chemical Name:

Ammonia (anhydrous)

CAS Number:

7664-41-7

Quantity (lbs):

48200000

CBI Claimed:

Toxic

Flammable/Toxic:

EPA Facility Identifier: 1000 0006 8954

Plan Sequence Number: 1000017139

Process ID:

Description:

Process Chemical ID:

1000021281 Chlorine

1000025187

Program Level:

Program Level 3 process

Chemical Name: CAS Number:

Chlorine 7782-50-5

Quantity (lbs):

8900

CBI Claimed:

Flammable/Toxic:

Toxic

# **Process NAICS**

Process ID:

1000021280

Process NAICS ID:

1000021563

Program Level: NAICS Code:

Program Level 3 process

325312

NAICS Description:

Phosphatic Fertilizer Manufacturing

Process ID: Process NAICS ID: 1000021281 1000021564

Program Level:

Program Level 3 process

NAICS Code:

325312

NAICS Description:

Phosphatic Fertilizer Manufacturing

EPA Facility Identifier: 1000 0006 8954

# Plan Sequence Number: 1000017139 Section 2. Toxics: Worst Case

Percent Weight: Physical State:

Toxic Worst ID: 1000017237

100.0

Gas liquified by refrigeration

**DEGADIS** Model Used:

Release Duration (mins): 1716 1.5 Wind Speed (m/sec): Atmospheric Stability Class: Topography:

Urban

Passive Mitigation Considered

Dikes: Yes Enclosures: Yes Berms: Yes Drains: Yes Sumps: Yes

Other Type:

Toxic Worst ID: 1000017238

100.0 Percent Weight:

Gas liquified by pressure Physical State: EPA's RMP\*Comp(TM) Model Used:

Release Duration (mins): 10 Wind Speed (m/sec): 1.5 Atmospheric Stability Class: Topography: Urban

Passive Mitigation Considered

Dikes: Enclosures:

Berms: Yes Drains: Yes

Sumps: Other Type:

Plan Sequence Number: 1000017139

# Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000018766

Percent Weight: Physical State:

Model Used: Wind Speed (m/sec):

Atmospheric Stability Class:

Topography:

100.0

Gas DEGADIS

3.0 D

Urban

Passive Mitigation Considered

Dikes: Enclos

Enclosures:
Berms:
Drains:
Sumps:
Other Type:

Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain: Neutralization:

Excess Flow Valve:

Flares: Scrubbers:

Emergency Shutdown:

Other Type:

Toxic Alter ID: 1000018767

Percent Weight:

Physical State: Model Used:

Moder Osed.

Wind Speed (m/sec): Atmospheric Stability Class:

Topography:

100.0

Gas

EPA's RMP\*Comp(TM)

3.0 D

Urban

Passive Mitigation Considered

Dikes: Enclosures:

Berms:

Drains:

Sumps: Other Type: Yes

Active Mitigation Considered

Sprinkler System: Deluge System:

Water Curtain: Neutralization:

Excess Flow Valve:

Flares: Scrubbers:

EPA Facility Identifier: 1000 0006 8954

Plan Sequence Number: 1000017139

Emergency Shutdown:

Other Type:

# Toxic Alter ID: 1000018768

Percent Weight:

100.0

Physical State:

Gas

Model Used:

EPA's RMP\*Comp(TM)

Wind Speed (m/sec):

3.0

Atmospheric Stability Class:

D

Topography:

Urban

# Passive Mitigation Considered

Dikes:

Enclosures:

Yes

Berms: Drains: Sumps:

Other Type:

### Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Neutralization:

Excess Flow Valve:

Flares:

Scrubbers:

Emergency Shutdown:

Other Type:

EPA Facility Identifier: 1000 0006 8954

# Section 4. Flammables: Worst Case

No records found.

Plan Sequence Number: 1000017139

# Section 5. Flammables: Alternative Release

No records found.

EPA Facility Identifier: 1000 0006 8954

Plan Sequence Number: 1000017139

# **Section 6. Accident History**

No records found.

EPA Facility Identifier: 1000 0006 8954 Plan Sequence Number: 1000017139

# Section 7. Program Level 3

Description

Diammonium Phosphate Plan

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:

1000021158

Chemical Name:

Ammonia (anhydrous)

Flammable/Toxic:

Toxic

CAS Number:

7664-41-7

Prevention Program Level 3 ID:

1000017831

NAICS Code:

325312

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):

30-Jun-2009

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA

30-Jan-2010

update):

The Technique Used

What If:

Yes

Checklist:

Yes

What If/Checklist:

HAZOP:

Failure Mode and Effects Analysis:

Fault Tree Analysis:

Other Technique Used:

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

30-Mar-2010

Major Hazards Identified

Toxic Release:

Yes

Fire:

Yes

Explosion:

Runaway Reaction:

Polymerization:

Overpressurization:

Yes

Corrosion:

Yes

Overfilling:

Yes

Contamination:

Yes

Equipment Failure:

Yes

Loss of Cooling, Heating, Electricity, Instrument Air:

Earthquake:

Floods (Flood Plain):

Facility Name: Mississippi Phosphates Corporation EPA Facility Identifier: 1000 0006 8954 Plan Sequence Number: 1000017139 Tornado: Yes Yes Hurricanes: Other Major Hazard Identified: Process Controls in Use Vents: Yes Relief Valves: Yes Check Valves: Yes Scrubbers: Flares: Yes Manual Shutoffs: Yes Automatic Shutoffs: Yes Interlocks: Yes Alarms and Procedures: Yes Keyed Bypass: Emergency Air Supply: **Emergency Power:** Yes Backup Pump: Yes Grounding Equipment: Inhibitor Addition: Rupture Disks: Yes Excess Flow Device: Yes Quench System: Purge System: None: Other Process Control in Use: Mitigation Systems in Use Sprinkler System: Dikes: Yes Fire Walls: Blast Walls: Deluge System: Water Curtain: Enclosure: Neutralization: None: Other Mitigation System in Use: Monitoring/Detection Systems in Use Process Area Detectors: Perimeter Monitors: Other Monitoring/Detection System in Use: Operator Rounds Changes Since Last PHA Update Reduction in Chemical Inventory:

Installation of Process Detection Systems:

Increase in Chemical Inventory: Change Process Parameters: Installation of Process Controls:

•	e: Mississippi Phosphates Corporation Identifier: 1000 0006 8954		Plan Sequence Number: 1000017139
Errer dointy	Installation of Perimeter Monitoring Systems:		
	Installation of Mitigation Systems:	•	
	None Recommended:	Yes	
	None:		
	Other Changes Since Last PHA or PHA Update:		
Review o	f Operating Procedures		
	Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	30-Jan-2010	
Training			
	Training Revision Date (The date of the most recent review or revision of training programs):	20-Feb-2010	
The Type	of Training Provided		
	Classroom:	Yes	
	On the Job:	Yes	
	Other Training:		
The Type	e of Competency Testing Used		
	Written Tests:	Yes	
	Oral Tests:	Yes	
	Demonstration:	Yes	
	Observation:	Yes	
	Other Type of Competency Testing Used:	Skills Demonstration	
Maintena	nce		
	Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	30-Mar-2010	
	Equipment Inspection Date (The date of the most recent equipment inspection or test):	31-Aug-2010	
	Equipment Tested (Equipment most recently inspected or tested):	Ammonia Storage Tank	
Manager	nent of Change		
	Change Management Date (The date of the most recent change that triggered management of change procedures):	30-Jan-2010	
	Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	30- <b>Mar-</b> 2010	

Pre-Startup Review

EPA Facility Identifier: 1000 0006 8954

Plan Sequence Number: 1000017139

Pre-Startup Review Date (The date of the most recent pre-startup review):

Compliance Audits

Compliance Audit Date (The date of the most recent 24-Sep-2010 compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

08-Oct-2010

30-Mar-2010

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

10-Apr-2010 10-Apr-2010

**Employee Participation Plans** 

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):

31-Aug-2010

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most 31-Aug-2010 recent review or revision of hot work permit procedures):

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

15-May-2010

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

31-Jan-2008

Confidential Business Information

CBI Claimed:

Description

Chlorine storage systems

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:

1000021159 Chlorine

Chemical Name: Flammable/Toxic:

Toxic

CAS Number:

7782-50-5

Prevention Program Level 3 ID:

1000017833

NAICS Code:

325312

Safety Information

Safety Review Date (The date on which the safety

information was last reviewed or revised):

30-Sep-2010

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):

04-Oct-2010

The Technique Used

What If:

Yes

Checklist:

What If/Checklist:

HAZOP:

Failure Mode and Effects Analysis:

Fault Tree Analysis:

Other Technique Used:

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

Major Hazards Identified

Toxic Release:

Yes

Fire:

Explosion:

Runaway Reaction: Polymerization:

Overpressurization:

Yes

Corrosion: Overfilling:

Contamination:

Equipment Failure:

Loss of Cooling, Heating, Electricity, Instrument Air:

Earthquake:

Floods (Flood Plain):

Tornado:

Yes

Yes

EPA Facility Identifier:	1000 0006 8954		Plan Sequence Number: 1000017139
Hurricane	es:	Yes	
Other Ma	jor Hazard Identified:		
Process Controls	s in Use		
\/t			
Vents: Relief Va	lvos:		
Check Va			
Scrubber			
Flares:	<b>0</b> .		
Manual S	shutoffs:	Yes	
	c Shutoffs:	. 00	
Interlocks			
Alarms a	nd Procedures:		
Keyed By	/pass:		
	cy Air Supply:		
	cy Power:		
Backup F			
Groundin	g Equipment:		
Inhibitor /	Addition:		
Rupture I	Disks:		
Excess F	low Device:		
Quench S	System:		
Purge Sy	stem:		
None:			
Other Pro	ocess Control in Use:		
Mitigation Syster	ns in Use		
Sprinkler	System:		
Dikes:	,	Yes	
Fire Wall	s:		
Blast Wa	lls:		
Deluge S	ystem:		
Water Cu	ırtain:		
Enclosure	e;		
Neutraliz	ation:		
None:			
Other Mit	igation System in Use:		
Monitoring/Detec	ction Systems in Use		
<b>5</b>	Area Detectors:		
	Area Detectors:		
	r Monitors:		
None:	unitoring/Detection System in Use:	Human verification during sh	sifte
Other Mc	onitoring/Detection System in Use:	Human verification during sh	mis
Changes Since L	ast PHA Update		
Reductio	n in Chemical Inventory:		
	in Chemical Inventory:		
	Process Parameters:		

Installation of Process Controls:

Installation of Process Detection Systems: Installation of Perimeter Monitoring Systems:

•	e. Mississippi Phosphates Corporation Identifier: 1000 0006 8954	Plan Sequence Number: 1000017139
	Installation of Mitigation Systems:	
	None Recommended:	
	None:	
	Other Changes Since Last PHA or PHA Update:	Covering for overheating protection
Review o	f Operating Procedures	
	Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	04-Oct-2010
Training		
	Training Revision Date (The date of the most recent review or revision of training programs):	10-Sep-2010
The Type	of Training Provided	
	Classes	Yes
	Classroom: On the Job:	165
	Other Training:	
	g.	
The Type	of Competency Testing Used	
	Written Tests:	Yes
	Oral Tests:	
	Demonstration:	
	Observation:	
	Other Type of Competency Testing Used:	
Maintena	nce	
	Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	30-Sep-2010
	Equipment Inspection Date (The date of the most recent equipment inspection or test):	30-Sep-2010
	Equipment Tested (Equipment most recently inspected or tested):	One ton chlorine cylinders
Managen	nent of Change	
	Change Management Date (The date of the most recent change that triggered management of change procedures):	24-Sep-2010
	Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	24-Sep-2010
Pre-Start	up Review	

EPA Facility Identifier: 1000 0006 8954

Pre-Startup Review Date (The date of the most recent pre-startup review):

### Compliance Audits

Compliance Audit Date (The date of the most recent 24-Sep-2010 compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

15-Oct-2010

# Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

# **Employee Participation Plans**

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):

30-Sep-2010

### Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most 30-Aug-2010 recent review or revision of hot work permit procedures):

# Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

### Confidential Business Information

CBI Claimed:

EPA Facility Identifier: 1000 0006 8954

Plan Sequence Number: 1000017139

# Section 8. Program Level 2

No records found.

# EPA Facility Identifier: 1000 0006 8954

# Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):

Yes

Facility Plan (Does facility have its own written emergency response plan?):

Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Yes

Healthcare (Does facility's ER plan include information on emergency health care?):

Yes

### **Emergency Response Review**

Review Date (Date of most recent review or update 31-Jul-2010 of facility's ER plan):

### **Emergency Response Training**

Training Date (Date of most recent review or update 30-Aug-2010 of facility's employees):

### Local Agency

Agency Name (Name of local agency with which the Jackson County LEPC facility ER plan or response activities are coordinated):

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):

(228) 769-3111

### Subject to

OSHA Regulations at 29 CFR 1910.38: Yes
OSHA Regulations at 29 CFR 1910.120: Yes
Clean Water Regulations at 40 CFR 112: Yes
RCRA Regulations at CFR 264, 265, and 279.52: Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:
State EPCRA Rules or Laws: Yes

Other (Specify):

# **Executive Summary**

Mississippi Phosphates Corporartion (MPC) is a manufacturer of fertilizers. A main ingredient in our product is ammonia that is used in the final process of manufacturing diammonium phosphate fertilizers. It is fertilizers such as this that in turn feed and clothe the rest of the world.

Among the many things that MPC brings to the community is a commitment to operate safely. The company recognizes the health concerns of its neighboring community and is committed to responding to those concerns. A safe workplace is a top priority for company management and personnel, and MPC employees continuously look for innovative ways to operate and maintain the production facilities. MPC participates in routine safety training programs and drills. In addition, continuous monitoring and assessment of the plant facilities ensures that all operations are running smoothly and efficiently.

MPC has a close working relationship with local emergency responders, and together they are prepared to respond to chemical emergencies. To ensure proper emergency preparedness, MPC has a team of employees trained in confined space rescue, hazardous waste operations and other specialities.

MPC transfers ammonia in a pipeline form to its atmospheric storage tank and to its fertilizer plant continuously. A rupture of this pipeline would result in a release of 1,300 pounds of ammonia in an 8-minute period. Under the regulatory defined parameters produces a scenario with a 0.40-mile distance to the endpoint. The distances to the endpoint for the alternate scenarios were also determined by the use of a computer air modeling program called DEGADIS.

MPC uses Chlorine as a water treatment chemical for it's cooling tower located in the sulfuric acid manufacturing unit as well as treatment in the facility potable water system. The facility has four one-ton cylinders located at the water tower. No more than one cylinder is in use at any time. A worst case scenario involving one of the cylinders would release 2000 pounds in 10 minutes. Under the regulatory defined parameters produces a scenario with a 1.3-mile distance to the endpoint. The alternative scenario involves a leak of one of the 5-150 pound cylinders which would result in a release of 15 lbs per minute for 10-minutes. The distance to this endpoint for the alternative scenario would be 0.1 miles. Both the worst case and alternative case were modeled using RMP-COMP software.

MPC has multiple layers of

safety and environmental protection in place at our facility to protect our employees and the community. The following covers some of these layers of potection:

Managing risks is something MPC does on a daily basis.

We have worked for many years to reduce risks at our site and to be prepared for emergencies.

Our employees are highly skilled and well trained.

Our equipment is routinely inspected and tested to make sure it is safe.

We have controls in the process throughout our plants to detect potential leaks or releases before they occur.

Hazard reviews add another layer of protection. They involve "what if" scenarios where employee teams investigate every possible scenario of a new project and resolve it as part of the design phase of the project.

Emergency response, including employee responders as well as off-site responders, add another layer of protection to the community.

We work closely with the police and fire departments, and we conduct routine drills.

In the event of an emergency, we are prepared to respond.

MPC has taken all the necessary steps to comply with the accidental release prevention requirements set forth under 40 CFR Part 68 of the EPA. The following summarizes the elements to the release prevention program that are in place at our Pascagoula facility.

#### Process Safety Information:

Workplace health and safety are of paramount concern. MPC maintains a file and makes its employees aware of processs safety information that describes the chemical hazards, operating parameters and equipment designs associated with all processes.

#### Process Hazard Analysis:

MPC conducts comprehensive studies to ensure that hazards associated with our processes are identified and controlled efficiently. The methodology used to carry out thes analysis is known as the Hazard and Operability (HZAP) study. The studies are undertaken by a team of qualified personnel with expertise in engineering and process operations and are revalidated every five years. Any findings related to the hazard analysis are addressed in a timely manner.

#### Operating Procedures:

For the purposes of safely conducting activities within our covered processes, MPC maintains written operating procedures. These procedures address various modes of operation such as initial startup, normal operations, temporary operations, emergency shutdown, emergency operations, normal shutdown and startup after a turnaround. The information is regularly reviewed and is readily accessible to operators involved in the processes.

#### Training:

MPC has a training program in place to inform and educate employees and to ensure they are competent in the operating procedures associated with these processes. Refresher training is provided at least every three years and more frequently as needed.

#### Mechanical Integrity:

MPC carries out documented maintenance checks on covered process equipment during each operational turnaround to ensure proper operations. Process equipment examined by these checks include among others; pressure vessels, storage tanks, piping systems, relief and vent systems, emergency shutdown systems, controls and pumps. Qualified personnel carry out maintenance operations with training as needed. Any equipment deficiencies identified by the maintenance checks are corrected in a safe and timely manner.

### Management of Change:

Written procedures are in place at MPC to manage changes in covered process chemicals, technology, equipment and procedures. Process operators, maintenance personnel or any other employee whose job tasks are affected by a modification in process conditions are promptly made aware of and offered training to deal with the modification.

### Pre-startup Reviews:

Pre-startup safety reviews of new processes and to significant modifications in existing processes are conducted as a regular practice at MPC. These reviews are conducted to confirm that construction, equipment, operating and maintenance procedures are suitable for safe startup prior to placing equipment into operation.

### Compliance Audits:

MPC conducts audits on a regular basis to monitor and sustain this process and ensure MPC management is kept informed of all safety, health and environmental matters. Formal audits will be carried out at least every 3 years and any corrective actions required as a result of the audits will be undertaken in a safe and prompt manner.

#### Incident Investigation:

MPC promptly investigates any incident that has resulted in, or could reasonably result in, a castastrophic release of a regulated substance. These investigations are undertaken to identify the situation leading to the incident, as well as any corrective actions to prevent the release from reoccurring. All reports are retained for a minimum of 5 years.

### Employee Participation:

MPC truly believes that process safety management and accident prevention is a team effort. Company employees are strongly encouraged to express their views concerning accident prevention issues and to recommend imporvements. In addition, our employees have access to all information created as part of the facility's implementation of the EPA Risk Management Program rule, including information resulting from process hazard analysis in particular.

EPA Facility Identifier: 1000 0006 8954 Plan Sequence Number: 1000017139

#### Hot Work Permits:

MPC recognizes the inherent danger associated with hot work and requires the issuance of a work permit for all such activities at the facility. The permit documents that all appropriate fire prevention requirements have been considered and implemented prior to beginning the hot work operations. The permit is kept at the site of the work until completion of the hot work operation.

#### Contractors:

MPC hires outside contractors to conduct some specialized maintenance and construction projects. All contractors working in the facility, or visitors to the facility, are expected to be aware of and adhere to all MPC health, safety, and environmental policies and procedures. MPC will conduct or require proof of appropriate training. MPC has a set policy for informing the contractors of known potential hazards related to the contractor's work and the processes. Contractors are also informed of all the procedures for emergency response should an accidental release of a regulated substance occur.

MPC has an extensive emergency response program. Within the facility there is a written Emergency Respons Plan (ERP). The ERP is designed as a guide to help in determining the magnitude of an incident, the steps needed to bring the incident under control and the requirements to ensure that all federal, state and local laws are complied with. The ERP is a definitive plan that asigns responsibilities, defines several different methods of communication, assigns control centers and safe havens, designates evacuation procedures, and coordinates with ouside assistance. The plan has detailed action plans that specifically address incidents concerning chemical spills, fire, acts of nature, personnel injury or fatality and equipment failures.

The plan also designates the type and frequency of training that each person is required to have depending on their responsibilities. Furthermore, the plan commits the management team to devote the necessary resources to prepare, implement and audit the ERP.

MPC is striving on a daily basis to make the facility as safe as possible for the employees, contractors and the community. MPC literally has safety and/or environmental training going on almost daily. Every employee and contractor will attend numerous safety and/or environmental meetings annually. MPC and its employees have an enduring commitment to protecting health, safety and environment and our success is accomplished by research, innovation and the use of good common sense practices.

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•		
	,	